

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOSUE ROMERO on behalf of himself and  
all others similarly situated,

Plaintiffs,

-against-

ZIP TOP, LLC.,

Defendant.

Case No. 1:20-cv-10189-LJL

**DECLARATION OF JOSUE ROMERO**

I, Josue Romero, declare under penalty of perjury as follows:

1. I am completely blind. I received a verification of Legal Blindness from the New York State Commission for the Blind in 2017.
2. Mr. Mizrahi is my attorney. His firm was recommended to me by a friend who had previously worked with Mr. Mizrahi's firm. Neither Mr. Mizrahi nor anyone from his firm approached me about becoming a client.
3. I live in the Southern District of New York. My address is 294 E 162<sup>nd</sup> St., Bronx NY 10451.
4. This instant action concerns visits I made to the Defendant's website, [www.ziptop.com](http://www.ziptop.com).  
I was unable to complete a purchase on that website due to technical errors which blocked access via my screen reader. I informed Mr. Mizrahi of the issues I was having with this website. Based on my information, his firm drafted a complaint that these barriers violated my legal rights under the Americans with Disabilities Act and New York law. I reviewed and approved of the filing of this lawsuit.
5. For many years I have owned a computer with screen reading software installed for my

personal use to browse the internet. Neither Mr. Mizrahi nor anyone from his firm provided me with the computer or taught me how to use the screen reader.

6. I received no "consideration" for filing lawsuits. In other cases that were settled, I received my share of the recovery in accordance with the relevant retainer agreement, and counsel receives its share to cover legal fees and costs.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 12, 2021.

J. Romero

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JOSUE ROMERO